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October 6, 2008

**VIA HAND DELIVERY**

The Honorable Charles L.A. Terreni  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

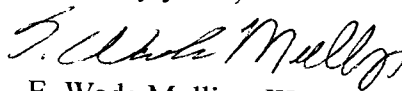
RE: **South Carolina Electric and Gas Company –Application for Mid-Period  
Adjustment in Two Phases of Base Rates Charged by South Carolina  
Electric and Gas Company for the Recovery of Fuel Costs Associated with Its  
Service to Retail Electrical Customers  
Public Service Commission of South Carolina Docket No. 2008-302-E  
Our File No.: 7-1719-103**

Dear Mr. Terreni:

Enclosed for filing please find the original and twenty-five (25) copies of the Direct Testimony of Dr. Dennis W. Goins on behalf of CMC Steel South Carolina in the above referenced matter. I have also enclosed two extra copies of the Direct Testimony and would appreciate you file stamping the extra copy and returning it to me via courier. By copy of this letter, I am serving all parties of record. If you have any questions or need additional information, please do not hesitate to contact me.

With my kindest regards, I am

Sincerely yours,



E. Wade Mullins, III

EWM/rdd  
Enclosures

cc: Counsel of Record  
Damon E. Xenopoulos, Esquire

# STATE OF SOUTH CAROLINA

## (Caption of Case)

South Carolina Electric & Gas Company -  
Application for Mid-Period Adjustment in Two  
Phases of Base Rates Charged by South Carolina  
Electric and Gas Company for the Recovery of Fuel  
Costs Associated with Its Service to Retail Electrical  
Customers

## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

### COVER SHEET

### DOCKET

NUMBER: 2008 - 302 - E

(Please type or print)

Submitted by: E. Wade Mullins, III

Address: P.O. Box 61110

Columbia, SC 29260

SC Bar Number: 3525

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

### DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition

☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: \_\_\_\_\_

#### INDUSTRY (Check one)

- ☒ Electric
- ☐ Electric/Gas
- ☐ Electric/Telecommunications
- ☐ Electric/Water
- ☐ Electric/Water/Telecom.
- ☐ Electric/Water/Sewer
- ☐ Gas
- ☐ Railroad
- ☐ Sewer
- ☐ Telecommunications
- ☐ Transportation
- ☐ Water
- ☐ Water/Sewer
- ☐ Administrative Matter
- ☐ Other: \_\_\_\_\_

#### NATURE OF ACTION (Check all that apply)

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Affidavit                 | <input checked="" type="checkbox"/> Letter                 | <input type="checkbox"/> Request                   |
| <input type="checkbox"/> Agreement                 | <input type="checkbox"/> Memorandum                        | <input type="checkbox"/> Request for Certification |
| <input type="checkbox"/> Answer                    | <input type="checkbox"/> Motion                            | <input type="checkbox"/> Request for Investigation |
| <input type="checkbox"/> Appellate Review          | <input type="checkbox"/> Objection                         | <input type="checkbox"/> Resale Agreement          |
| <input type="checkbox"/> Application               | <input type="checkbox"/> Petition                          | <input type="checkbox"/> Resale Amendment          |
| <input type="checkbox"/> Brief                     | <input type="checkbox"/> Petition for Reconsideration      | <input type="checkbox"/> Reservation Letter        |
| <input type="checkbox"/> Certificate               | <input type="checkbox"/> Petition for Rulemaking           | <input type="checkbox"/> Response                  |
| <input type="checkbox"/> Comments                  | <input type="checkbox"/> Petition for Rule to Show Cause   | <input type="checkbox"/> Response to Discovery     |
| <input type="checkbox"/> Complaint                 | <input type="checkbox"/> Petition to Intervene             | <input type="checkbox"/> Return to Petition        |
| <input type="checkbox"/> Consent Order             | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation               |
| <input type="checkbox"/> Discovery                 | <input checked="" type="checkbox"/> Prefiled Testimony     | <input type="checkbox"/> Subpoena                  |
| <input type="checkbox"/> Exhibit                   | <input type="checkbox"/> Promotion                         | <input type="checkbox"/> Tariff                    |
| <input type="checkbox"/> Expedited Consideration   | <input type="checkbox"/> Proposed Order                    | <input type="checkbox"/> Other: _____              |
| <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest                           |  |
| <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit             |  |
| <input type="checkbox"/> Late-Filed Exhibit        | <input type="checkbox"/> Report                            |  |

**Docket No. 2008-302-E**

**South Carolina Electric & Gas Company  
– Application for Mid-Period Adjustment  
in Two Phases of Base Rates Charged by  
South Carolina Electric and Gas  
Company for the Recovery of Fuel Costs  
Associated with Its Service to Retail  
Electric Customers**


)  
)  
)  
) **CERTIFICATE OF SERVICE**  
)  
)  
)  
)  
)

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P.O. Box 61110  
Columbia, South Carolina 29260

Columbia, South Carolina  
October 6, 2008

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**STATE OF SOUTH CAROLINA  
BEFORE THE  
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

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**DOCKET NO. 2008-302-E**

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**APPLICATION OF SOUTH CAROLINA ELECTRIC & GAS  
COMPANY FOR MID-PERIOD ADJUSTMENT OF BASE  
RATES FOR THE RECOVERY OF ELECTRIC FUEL COSTS**

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**DIRECT TESTIMONY OF  
DR. DENNIS W. GOINS  
ON BEHALF OF  
CMC STEEL SOUTH CAROLINA**

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**October 6, 2008**

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**STATE OF SOUTH CAROLINA  
BEFORE THE  
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

**IN RE: APPLICATION OF SOUTH CAROLINA )  
ELECTRIC & GAS COMPANY FOR MID-PERIOD )  
ADJUSTMENT OF BASE RATES FOR THE )  
RECOVERY OF ELECTRIC FUEL COSTS )**

**Docket No. 2008-302-E**

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**DIRECT TESTIMONY OF  
DR. DENNIS W. GOINS  
ON BEHALF OF  
CMC STEEL SOUTH CAROLINA**

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**INTRODUCTION AND QUALIFICATIONS**

1  
2 **Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS**  
3 **ADDRESS.**

4 **A.** My name is Dennis W. Goins. I operate Potomac Management Group, an  
5 economics and management consulting firm. My business address is 5801  
6 Westchester Street, Alexandria, Virginia 22310.

7 **Q. PLEASE DESCRIBE YOUR EDUCATIONAL AND**  
8 **PROFESSIONAL BACKGROUND.**

9 **A.** I received a Ph.D. degree in economics and a Master of Economics degree  
10 from North Carolina State University. I also earned a B.A. degree with  
11 honors in economics from Wake Forest University. From 1974 through  
12 1977 I worked as a staff economist at the North Carolina Utilities  
13 Commission (NCUC). During my tenure at the NCUC, I testified in  
14 numerous cases involving electric, gas, and telephone utilities on such  
15 issues as cost of service, rate design, intercorporate transactions, and load

1 forecasting. While at the NCUC, I also served as a member of the  
2 Ratemaking Task Force in the national Electric Utility Rate Design Study  
3 sponsored by the Electric Power Research Institute (EPRI) and the  
4 National Association of Regulatory Utility Commissioners (NARUC).

5 Since 1978 I have worked as an economic and management consultant  
6 to firms and organizations in the private and public sectors. My  
7 assignments focus primarily on market structure, policy, planning, and  
8 pricing issues involving firms that operate in energy markets. For example,  
9 I have conducted detailed analyses of product pricing, cost of service, rate  
10 design, and interutility planning, operations, and pricing; prepared  
11 analyses related to utility mergers, transmission access and pricing, and the  
12 emergence of competitive markets; evaluated and developed regulatory  
13 incentive mechanisms applicable to utility operations; and assisted clients  
14 in analyzing and negotiating interchange agreements and power and fuel  
15 supply contracts. I have also assisted clients on electric power market  
16 restructuring issues in Arkansas, New Jersey, New York, South Carolina,  
17 Texas, and Virginia.

18 I have submitted testimony and affidavits and provided technical  
19 assistance in more than 100 proceedings before state and federal agencies  
20 as an expert in competitive market issues, regulatory policy, utility  
21 planning and operating practices, cost of service, and rate design. These  
22 agencies include the Federal Energy Regulatory Commission (FERC), the  
23 Government Accountability Office, the First Judicial District Court of  
24 Montana, the Circuit Court of Kanawha County, West Virginia, and  
25 regulatory agencies in Alabama, Arizona, Arkansas, Colorado, Florida,  
26 Georgia, Idaho, Illinois, Kentucky, Louisiana, Maine, Maryland,  
27 Massachusetts, Minnesota, Mississippi, New Jersey, New York, North  
28 Carolina, Ohio, Oklahoma, South Carolina, Texas, Utah, Vermont,  
29 Virginia, and the District of Columbia. Additional details of my  
30 educational and professional background are presented in the Appendix.

1 Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS  
2 PROCEEDING?

3 A. I am testifying on behalf of CMC Steel South Carolina, a member of the  
4 CMC Steel Group.

5 Q. WHAT ASSIGNMENT WERE YOU GIVEN WHEN YOU WERE  
6 RETAINED?

7 A. I was asked to undertake two primary tasks:

- 8 1. Review the filing made by South Carolina Electric & Gas  
9 Company (SCE&G) for a mid-period adjustment in its base fuel  
10 rate.
- 11 2. Identify any major deficiencies in SCE&G's proposal, and suggest  
12 recommended changes.

13 Q. WHAT SPECIFIC INFORMATION DID YOU REVIEW IN  
14 CONDUCTING YOUR EVALUATION?

15 A. I reviewed SCE&G's filing, testimony, exhibits, and responses to requests  
16 for information. I also reviewed information found on web sites operated  
17 by the Commission, SCE&G and its parent—SCANA Corporation, and  
18 other entities that compile and disseminate information regarding fuel  
19 markets (for example, the Energy Information Administration).

20 **CONCLUSIONS**

21 Q. WHAT CONCLUSIONS HAVE YOU REACHED?

22 A. On the basis of my review and evaluation, I have concluded the following:  
23 1. SCE&G has proposed a 2-step increase in the current base fuel rate  
24 of 26.41 mills per kWh that would be in effect from November  
25 2008 through April 2009. The first step increase would be 6.50  
26 mills per kWh (24.6 percent increase), resulting in a base fuel rate

1 of 32.91 mills per kWh effective only for November and December  
2 2008. A second 6.50 mills per kWh increase—raising the base fuel  
3 rate to 39.41 mills per kWh—would be effective from January  
4 through April 2009. As a result of SCE&G's proposal, the current  
5 base fuel rate would increase by 49.2 percent—from 26.41 mills  
6 per kWh to 39.41 mills per kWh.

- 7 2. SCE&G's estimated accumulated deferred fuel cost balance at the  
8 end of October 2008 is approximately \$146 million. SCE&G  
9 forecasts that its proposed 2-step base fuel rate increase will reduce  
10 this under-recovery to \$73.7 million by the end of April 2009.
- 11 3. The increase in SCE&G's fuel costs appears to have been driven  
12 primarily by continuing increases in coal and natural gas prices.
- 13 4. Despite huge increases in its fuel costs in the past 4 years, SCE&G  
14 still has no financial hedging program in place to mitigate price  
15 volatility in its coal and natural gas purchases.

## 16 RECOMMENDATIONS

17 **Q. WHAT DO YOU RECOMMEND ON THE BASIS OF THESE**  
18 **CONCLUSIONS?**

19 **A.** I recommend that the Commission:

- 20 1. Reject SCE&G's proposed 2-step increase in its base fuel rate.  
21 Instead, the Commission should set the rate—subject to refund—at  
22 32.91 mills per kWh for November through April 2009. This rate  
23 is identical to the first step increase proposed by SCE&G. Any  
24 projected under-recovery in SCE&G's fuel costs through April  
25 2009 can be dealt with in its 2009 fuel case.
- 26 2. Set procedures for SCE&G's 2009 fuel case that will allow parties  
27 to begin discovery at least 4 months prior to the date they must file  
28 testimony. This will give parties a reasonable amount of time to

1 analyze and evaluate whether SCE&G acted prudently in incurring  
2 fuel costs since January 2008,<sup>1</sup> and to present their findings in the  
3 2009 fuel case. My recommended 4-month window for discovery  
4 and the filing of testimony should also apply to SCE&G's  
5 subsequent annual fuel reviews.

6 **SCE&G'S PROPOSAL**

7 **Q. WHAT IS SCE&G'S CURRENT BASE FUEL RATE?**

8 **A.** The current rate (effective May 2008 – April 2009) is 26.41 mills per  
9 kWh. This rate resulted from a settlement in SCE&G's last annual fuel  
10 review (Docket No. 2008-2-E).

11 **Q. WHAT BASE FUEL RATE HAS SCE&G PROPOSED IN THIS**  
12 **CASE?**

13 **A.** SCE&G has proposed a 2-step increase in its base fuel rate.

14 ■ Step 1 is 6.50 mills per kWh increase (24.6 percent) to 32.91  
15 mills per kWh effective only for November and December  
16 2008.

17 ■ Step 2 is an additional 6.50 mills per kWh increase to 39.41  
18 mills per kWh effective January - April 2009.

19 As a result of the proposed 2-step increase, SCE&G's base fuel rate would  
20 increase by 13.00 mills per kWh (49.2 percent)—going from 26.41 mills  
21 per kWh to 39.41 mills per kWh.

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<sup>1</sup> In Docket No. 2008-2-E, the Commission set SCE&G's base fuel rate based on actual fuel costs through January 2008 and forecast fuel costs from February 2008 - April 2009. As a result, SCE&G's actual fuel costs since January 2008 have not been subjected to a full Commission review.

1   **Q.   DOES SCE&G'S PROPOSAL CONTINUE THE RECENT**  
2       **UPWARD TREND IN ITS BASE FUEL RATE?**

3   **A.**   Yes. For example, the base fuel rate approved in 2005 (Docket No. 2005-  
4       2-E) for May 2005 – April 2006 was 22.56 mills per kWh. If the  
5       Commission approves SCE&G's proposed base fuel rate, the fuel  
6       component of SCE&G's base rates will have increased by 16.85 mills per  
7       kWh (from 22.56 to 39.41 mills per kWh, or nearly 75 percent) in  
8       approximately 3 years.

9   **Q.   WHAT EFFECT WILL SCE&G'S PROPOSED BASE FUEL RATE**  
10       **HAVE ON CUSTOMERS' BILLS?**

11   **A.**   Based on information in SCE&G's testimony, the average monthly bill for  
12       residential customers will increase by more than 12 percent when the  
13       proposed increase is fully implemented,<sup>2</sup> resulting in an annual bill  
14       increase of nearly \$157. Increases for large, higher load factor industrial  
15       customers could be huge. For example, the annual increase for a 50-MW  
16       customer with a 70-percent load factor would be nearly \$4 million.

17   **Q.   WHAT ARE THE PRINCIPAL DRIVERS BEHIND THIS LARGE**  
18       **INCREASE IN SCE&G'S BASE FUEL RATE?**

19   **A.**   According to SCE&G, its fuel cost increases have been driven primarily  
20       by continuing increases in coal and natural gas prices.<sup>3</sup>

21   **Q.   WILL THE PROPOSED RATE ADJUSTMENT RECOVER**  
22       **SCE&G'S DEFERRED FUEL COST BALANCE?**

23   **A.**   No. SCE&G estimates that its accumulated deferred fuel cost balance at  
24       the end of October 2008 will be approximately \$146 million. Even with

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<sup>2</sup> See the direct testimony of SCE&G witness Allen W. Rooks at 5:14-20.

<sup>3</sup> See the direct testimony of SCE&G witnesses Gerhard Haimberger and Rose Jackson.

1 the proposed 2-step increase, SCE&G estimates that its under-recovered  
2 fuel cost balance at the end of April 2009 will be almost \$73.7 million.

3 **Q. DID SCE&G'S FORECASTS IN DOCKET NO. 2008-2-E**  
4 **INDICATE THAT THE BASE FUEL RATE APPROVED IN THAT**  
5 **CASE WOULD LEAD TO SUCH LARGE DEFERRED FUEL COST**  
6 **BALANCES?**

7 **A.** No. Based on forecasts that SCE&G presented in February 2008 in  
8 Docket No. 2008-2-E, the 26.41 mills per kWh base fuel rate approved in  
9 that case should have eliminated its under-recovered fuel cost balance by  
10 the end of April 2009. However, SCE&G's short-term forecasts in that  
11 case completely missed the mark in anticipating the increase in its fuel  
12 costs. For example, in the current case, SCE&G has provided actual data  
13 on its fuel costs and under-recovered fuel cost balance through August  
14 2008. I compared SCE&G's February 2008 forecasts (from Docket No.  
15 2008-2-E) of total system fuel costs, cumulative under-recovered fuel  
16 costs, and retail sales from May – August 2008 to actual data for these  
17 items for the same period that SCE&G has presented in this case. As  
18 shown in Table 1 below, SCE&G under-estimated its short-term fuel costs  
19 by more than 34 percent and its cumulative under-recovered fuel cost  
20 balance by more than 500 percent even though its retail sales forecast was  
21 only slightly below actual retail sales. In other words, SCE&G appears to  
22 have been caught completely unprepared by the upswing in coal costs and  
23 continuing volatility in natural gas markets.

**Table 1. SCE&G Forecast vs Actual: May - August 2008**

|                                 | Forecast      | Actual        | Difference    |         |
|---------------------------------|---------------|---------------|---------------|---------|
|                                 |               |               | Amount        | Percent |
| Total Fuel Costs                | \$250,089,000 | \$336,119,319 | \$86,030,319  | 34.40%  |
| Cumulative Under(Over)-Recovery | \$20,542,709  | \$125,791,213 | \$105,248,504 | 512.34% |
| Retail MWh Sales                | 8,285,000     | 8,030,838     | (254,162)     | -3.07%  |

Source: Forecast data from Allen W. Rooks, Docket No. 2008-2-E, direct testimony at Exhibit AWR-1.  
Actual data from Allen W. Rooks, Docket No. 2008-302-E, direct testimony at Exhibit AWR-2.

1  
2 **Q. SHOULD THE COMMISSION APPROVE SCE&G'S PROPOSED**  
3 **BASE FUEL RATE?**

4 **A.** No. I recommend that the Commission reject SCE&G's proposed 2-step  
5 increase in its base fuel rate. Instead, the Commission should approve my  
6 recommended alternative proposal.

7 **Q. WHAT ALTERNATIVE BASE FUEL RATE DO YOU**  
8 **RECOMMEND?**

9 **A.** I recommend setting the base fuel rate at 32.91 mills per kWh—subject to  
10 refund—for November 2008 – April 2009. This rate is the same as the  
11 rate that SCE&G proposed for its first step increase.

12 **Q. WHY DO YOU RECOMMEND A LOWER RATE THAN SCE&G**  
13 **IS PROPOSING IN THIS CASE?**

14 **A.** SCE&G is asking for a mid-term adjustment that deserves more scrutiny  
15 than can occur in the limited time for this proceeding. In my opinion,  
16 while SCE&G is entitled to recover its reasonable and prudent fuel costs,  
17 ratepayers are entitled to reasonable stability in their rates. Moreover,  
18 SCE&G's grossly inaccurate short-term forecasts presented last February  
19 should be investigated, and its actions to control coal and natural gas costs  
20 should be scrutinized. For example, despite years of fuel price volatility  
21 and dramatic cost increases, SCE&G continues not to implement coal and

1 natural gas hedging programs. Customers need to know if SCE&G's  
2 decision not to implement such programs has been reasonable and prudent.

3 **Q. UNDER YOUR RECOMMENDED ALTERNATIVE, WHAT IS**  
4 **SCE&G'S ESTIMATED DEFERRED FUEL COST BALANCE AT**  
5 **THE END OF APRIL 2009?**

6 **A.** The estimated under-recovery through April 2009 is approximately \$120.6  
7 million. (See Table 2 below and Exhibit DWG-1.)

**Table 2. Recommended Base Fuel Rate: Nov 2008 - April 2009**

|     |   |                |
|-----|---|----------------|
| 1.  | Total Fuel Costs Nov 2008 - April 2009            | \$ 357,839,000 |
| 2.  | Total System MWh Nov 2008 - April 2009            | 11,349,000     |
| 3.  | Fuel Cost (\$/kWh) Nov 2008 - April 2009          | 0.03153        |
| 4.  | Proposed Base Fuel Rate (\$/kWh)                  | 0.03291        |
| 5.  | Net Fuel Cost (\$/kWh) Nov 2008 - April 2009      | (0.00138)      |
| 6.  | Retail MWh Nov 2008 - April 2009                  | 10,637,000     |
| 7.  | Under(Over)-Recovery Nov 2008 - April 2009        | (\$14,674,346) |
| 8.  | Fixed Capacity Charges Nov 2008 - April 2009      | (\$10,712,142) |
| 9.  | Net Under(Over)-Recovery Nov 2008 - April 2009    | (\$25,386,488) |
| 10. | Under(Over)-Recovery through October 2008         | \$146,026,236  |
| 11. | Projected Under(Over)-Recovery through April 2009 | \$120,639,748  |

9 **Q. WHY DO YOU RECOMMEND APPROVING THE NEW BASE**  
10 **FUEL RATE SUBJECT TO REFUND?**

11 **A.** As I noted earlier, SCE&G's fuel costs should be carefully scrutinized in  
12 its 2009 fuel cost review. This review should focus not only on the  
13 reasonableness of SCE&G's projected fuel costs through April 2010, but  
14 also the reasonableness and prudence of SCE&G's fuel costs since Docket  
15 No. 2008-2-E—in particular, fuel costs since January 2008 and subsequent  
16 months that have not been subjected to a full Commission review.

1   **Q.    SHOULD THE COMMISSION ESTABLISH PROCEDURES TO**  
2       **ENSURE THAT ALL PARTIES HAVE REASONABLE AND**  
3       **TIMELY ACCESS TO INFORMATION REQUIRED TO**  
4       **EVALUATE THE REASONABLENESS AND PRUDENCE OF**  
5       **SCE&G'S FUEL COSTS?**

6   **A.    Yes.** In the order in this case, I recommend that the Commission set  
7       procedures to allow parties to begin discovery at least 4 months prior to  
8       the date they must file testimony in SCE&G's 2009 fuel case. A 4-month  
9       period is necessary to give parties reasonable time to prepare discovery,  
10      analyze and evaluate SCE&G's fuel costs, and prepare testimony. To  
11      ensure that all parties have adequate time to review, analyze, and evaluate  
12      SCE&G's fuel costs in future cases, my recommended 4-month window  
13      for discovery and the filing of testimony should also apply to SCE&G's  
14      post-2009 annual fuel reviews.

15   **Q.    DOES THIS COMPLETE YOUR DIRECT TESTIMONY?**

16   **A.    Yes.**

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**STATE OF SOUTH CAROLINA  
BEFORE THE  
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

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**DOCKET NO. 2008-302-E**

---

**APPLICATION OF SOUTH CAROLINA ELECTRIC & GAS  
COMPANY FOR MID-PERIOD ADJUSTMENT OF BASE  
RATES FOR THE RECOVERY OF ELECTRIC FUEL COSTS**

---

**EXHIBIT TO THE  
DIRECT TESTIMONY OF  
DR. DENNIS W. GOINS  
ON BEHALF OF  
CMC STEEL SOUTH CAROLINA**

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**October 6, 2006**

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[illegible]

**APPENDIX**

**QUALIFICATIONS OF**

**DENNIS W. GOINS**

## **DENNIS W. GOINS**

### **PRESENT POSITION**

Economic Consultant, Potomac Management Group, Alexandria, Virginia.

### **AREAS OF QUALIFICATION**

- Competitive Market Analysis
- Costing and Pricing Energy-Related Goods and Services
- Utility Planning and Operations
- Litigation Analysis, Strategy Development, Expert Testimony

### **PREVIOUS POSITIONS**

- Vice President, Hagler, Bailly & Company, Washington, DC.
- Principal, Resource Consulting Group, Inc., Cambridge, Massachusetts.
- Senior Associate, Resource Planning Associates, Inc., Cambridge, Massachusetts.
- Economist, North Carolina Utilities Commission, Raleigh, North Carolina.

### **EDUCATION**

| <b>College</b>                  | <b>Major</b> | <b>Degree</b> |
|---------------------------------|--------------|---------------|
| Wake Forest University          | Economics    | BA            |
| North Carolina State University | Economics    | ME            |
| North Carolina State University | Economics    | PhD           |

### **RELEVANT EXPERIENCE**

Dr. Goins specializes in pricing, planning, and market structure issues affecting firms that buy and sell products in electricity and natural gas markets. He has extensive experience in evaluating competitive market conditions, analyzing power and fuel requirements, prices, market operations, and transactions, developing product pricing strategies, setting rates for energy-related products and services, and negotiating power supply and natural gas contracts for private and public entities. He has participated in more than 100 cases as an expert on competitive market issues, utility restructuring, power market planning and

## **DENNIS W. GOINS**

operations, utility mergers, rate design, cost of service, and management prudence before the Federal Energy Regulatory Commission, the First Judicial District Court of Montana, the Circuit Court of Kanawha County, West Virginia, the General Accounting Office (now the Government Accountability Office), and regulatory commissions in Alabama, Arizona, Arkansas, Colorado, Florida, Georgia, Indiana, Idaho, Illinois, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Minnesota, Mississippi, New Jersey, New York, North Carolina, Ohio, Oklahoma, South Carolina, Texas, Utah, Vermont, Virginia, and the District of Columbia. He has also prepared an expert report on behalf of the United States regarding pricing and contract issues in a case before the United States Court of Federal Claims.

### **PARTICIPATION IN REGULATORY, ADMINISTRATIVE, AND COURT PROCEEDINGS**

1. South Carolina Electric & Gas Company, before the South Carolina Public Service Commission, Docket No. 2008-302-E (2008), on behalf of CMC Steel-SC, re fuel and purchased power cost recovery.
2. South Carolina Electric & Gas Company, before the South Carolina Public Service Commission, Docket No. 2008-196-E (2008), on behalf of CMC Steel-SC, re base load review order for a nuclear facility.
3. Alabama Power Company, before the Alabama Public Service Commission, Docket No. 18148 (2008), on behalf of CMC Steel Alabama, Nucor Steel Birmingham, and Nucor Steel Tuscaloosa, re energy cost recovery.
4. Idaho Power Company, before the Idaho Public Utilities Commission, Case No. IPC-E-08-10 (2008), on behalf of the U.S. Department of Energy (Federal Executive Agencies), re cost-of-service and rate design issues.
5. Ohio Edison *et al.*, before the Public Utilities Commission of Ohio, Case No. 08-935-EL-SSO (2008), on behalf of Nucor Steel Marion, Inc., re energy security plan proposal.
6. Ohio Edison *et al.*, before the Public Utilities Commission of Ohio, Case No. 08-936-EL-SSO (2008), on behalf of Nucor Steel Marion, Inc., re market rate offer proposal.
7. Entergy Texas, Inc., before the Public Utilities Commission of Texas, PUC Docket No. 35269 (2008), on behalf of Texas Cities, re jurisdictional allocation of system agreement payments.
8. Duke Energy Indiana, Inc., before the Indiana Utility Regulatory Commission, Cause No. 43374 (2008), on behalf of Nucor Steel and Steel Dynamics, Inc., re alternative regulatory plan.

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9. Entergy Gulf States Inc., before the Public Utilities Commission of Texas, PUC Docket No. 34800 (2008), on behalf of Texas Cities, re affiliate transactions.
10. Commonwealth Edison Company, before the Illinois Commerce Commission, Docket No. 07-0566 (2008), on behalf of Nucor Steel Kankakee, Inc., re cost-of-service and rate design issues.
11. Ohio Edison *et al.*, before the Public Utilities Commission of Ohio, Case No. 07-0551-EL-AIR *et al.* (2008), on behalf of Nucor Steel Marion, Inc., re cost-of-service and rate design issues.
12. Appalachian Power Company dba American Electric Power, before the Public Service Commission of West Virginia, Case No. 06-0033-E-CN (2007), on behalf of Steel of West Virginia, Inc., re power plant cost recovery mechanism.
13. Oncor Electric Delivery Company and Texas Energy Future Holdings Limited Partnership, before the Public Utilities Commission of Texas, PUC Docket No. 34077 (2007), on behalf of Nucor Steel - Texas, re acquisition of TXU Corp. by Texas Energy Future Holdings Limited Partnership.
14. Arkansas Oklahoma Gas Company, before the Arkansas Public Service Commission, Docket No. 07-026-U (2007), on behalf of West Central Arkansas Gas Consumers, re gas cost-of-service and rate design issues.
15. Idaho Power Company, before the Idaho Public Utilities Commission, Case No. IPC-E-07-08 (2007), on behalf of the U.S. Department of Energy (Federal Executive Agencies), re cost-of-service and rate design issues.
16. Potomac Electric Power Company, before the District of Columbia Public Service Commission, Formal Case No. 1056 (2007), on behalf of the General Services Administration, re demand-side management and advanced metering programs.
17. South Carolina Electric & Gas Company, before the South Carolina Public Service Commission, Docket No. 2007-229-E (2007), on behalf of CMC Steel-SC, re cost-of-service and rate design issues.
18. Potomac Electric Power Company, before the Maryland Public Service Commission, Case No. 9092 (2007), on behalf of the General Services Administration, re retail cost allocation and standby rate design issues for distributed generation resources.
19. Potomac Electric Power Company, before the District of Columbia Public Service Commission, Formal Case No. 1053 (2007), on behalf of the General Services Administration, re retail cost allocation and standby rate design issues for distributed generation resources.

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20. Entergy Gulf States Inc., before the Public Utilities Commission of Texas, PUC Docket No. 32907 (2006), on behalf of Texas Cities, re hurricane cost recovery.
21. Entergy Gulf States Inc., before the Public Utilities Commission of Texas, PUC Docket No. 32710/ SOAH Docket No. 473-06-2307 (2006), on behalf of Texas Cities, re reconciliation of fuel and purchased power costs.
22. Florida Power & Light Company, before the Florida Public Service Commission, Docket No. 060001-EI (2006), on behalf of the U.S. Air Force (Federal Executive Agencies), re fuel and purchased power cost recovery.
23. Arizona Public Service Company, before the Arizona Corporation Commission, Docket No. E-01345A-05-0816 (2006), on behalf of the U.S. Air Force (Federal Executive Agencies), re retail cost allocation and rate design issues.
24. PacifiCorp (dba Rocky Mountain Power), before the Utah Public Service Commission, Docket No. 06-035-21 (2006), on behalf of the U.S. Air Force (Federal Executive Agencies), re rate design issues.
25. South Carolina Electric & Gas Company, before the South Carolina Public Service Commission, Docket No. 2006-2-E (2006), on behalf of CMC Steel-SC, re fuel and purchased power cost recovery.
26. Entergy Gulf States Inc., before the Public Utilities Commission of Texas, PUC Docket No. 31544/ SOAH Docket No. 473-06-0092 (2006), on behalf of Texas Cities, re transition to competition rider.
27. Idaho Power Company, before the Idaho Public Utilities Commission, Case No. IPC-E-05-28 (2006), on behalf of the U.S. Department of Energy (Federal Executive Agencies), re cost-of-service and rate design issues.
28. Alabama Power Company, before the Alabama Public Service Commission, Docket No. 18148 (2005), on behalf of SMI Steel-Alabama, re energy cost recovery.
29. Florida Power & Light Company, before the Florida Public Service Commission, Docket No. 050001-EI (2005), on behalf of the U.S. Air Force (Federal Executive Agencies), re fuel and capacity cost recovery.
30. Entergy Gulf States Inc., before the Public Utilities Commission of Texas, PUC Docket No. 31315/ SOAH Docket No. 473-05-8446 (2005), on behalf of Texas Cities, re incremental purchased capacity cost rider.
31. Florida Power & Light Company, before the Florida Public Service Commission, Docket No. 050045-EI (2005), on behalf of the U.S. Air Force (Federal Executive Agencies), re cost-of-service and interruptible rate issues.

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32. Arkansas Electric Cooperative Corporation, before the Arkansas Public Service Commission, Docket No. 05-042-U (2005), on behalf of Nucor Steel and Nucor-Yamato Steel, re power plant purchase.
33. Arkansas Electric Cooperative Corporation, before the Arkansas Public Service Commission, Docket No. 04-141-U (2005), on behalf of Nucor Steel and Nucor-Yamato Steel, re cost-of-service and rate design issues.
34. Dominion North Carolina Power, before the North Carolina Utilities Commission, Docket No. E-22, Sub 412 (2005), on behalf of Nucor Steel-Hertford, re cost-of-service and interruptible rate issues.
35. Public Service Company of Colorado, before the Colorado Public Utilities Commission, Docket No. 04S-164E (2004), on behalf of the U.S. Air Force (Federal Executive Agencies), re cost-of-service and interruptible rate issues.
36. CenterPoint Energy Houston Electric, LLC, *et al.*, before the Public Utility Commission of Texas, PUC Docket No. 29526 (2004), on behalf of the Coalition of Commercial Ratepayers, re stranded cost true-up balances.
37. PacifiCorp, before the Utah Public Service Commission, Docket No. 04-035-11 (2004), on behalf of the U.S. Air Force (United States Executive Agencies), re time-of-day rate design issues.
38. Arizona Public Service Company, before the Arizona Corporation Commission, Docket No. E-01345A-03-0347 (2004), on behalf of the U.S. Air Force (Federal Executive Agencies), re retail cost allocation and rate design issues.
39. Idaho Power Company, before the Idaho Public Utilities Commission, Case No. IPC-E-03-13 (2004), on behalf of the U.S. Department of Energy (Federal Executive Agencies), re retail cost allocation and rate design issues.
40. PacifiCorp, before the Utah Public Service Commission, Docket No. 03-2035-02 (2004), on behalf of the U.S. Air Force (United States Executive Agencies), re retail cost allocation and rate design issues.
41. Dominion Virginia Power, before the Virginia State Corporation Commission, Case No. PUE-2000-00285 (2003), on behalf of Chaparral (Virginia) Inc., re recovery of fuel costs.
42. Jersey Central Power & Light Company, before the New Jersey Board of Public Utilities, BPU Docket No. ER02080506, OAL Docket No. PUC-7894-02 (2002-2003), on behalf of New Jersey Commercial Users, re retail cost allocation and rate design issues.

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43. Public Service Electric and Gas Company, before the New Jersey Board of Public Utilities, BPU Docket No. ER02050303, OAL Docket No. PUC-5744-02 (2002-2003), on behalf of New Jersey Commercial Users, re retail cost allocation and rate design issues.
44. South Carolina Electric & Gas Company, before the South Carolina Public Service Commission, Docket No. 2002-223-E (2002), on behalf of SMI Steel-SC, re retail cost allocation and rate design issues.
45. Montana Power Company, before the First Judicial District Court of Montana, *Great Falls Tribune et al. v. the Montana Public Service Commission*, Cause No. CDV2001-208 (2002), on behalf of a media consortium (*Great Falls Tribune, Billings Gazette, Montana Standard, Helena Independent Record, Missoulian*, Big Sky Publishing, Inc. dba *Bozeman Daily Chronicle*, the Montana Newspaper Association, *Miles City Star, Livingston Enterprise*, Yellowstone Public Radio, the Associated Press, Inc., and the Montana Broadcasters Association), re public disclosure of allegedly proprietary contract information.
46. Louisville Gas & Electric *et al.*, before the Kentucky Public Service Commission, Administrative Case No. 387 (2001), on behalf of Gallatin Steel Company, re adequacy of generation and transmission capacity in Kentucky.
47. PacifiCorp, before the Utah Public Service Commission, Docket No. 01-035-01 (2001), on behalf of Nucor Steel, re retail cost allocation and rate design issues.
48. TXU Electric Company, before the Public Utilities Commission of Texas, PUC Docket No. 23640/ SOAH Docket No. 473-01-1922 (2001), on behalf of Nucor Steel, re fuel cost recovery.
49. FPL Group *et al.*, before the Federal Energy Regulatory Commission, Docket No. EC01-33-000 (2001), on behalf of Arkansas Electric Cooperative Corporation, Inc., re merger-related market power issues.
50. Entergy Mississippi, Inc., *et al.*, before the Mississippi Public Service Commission, Docket No. 2000-UA-925 (2001), on behalf of Birmingham Steel-Mississippi, re appropriate regulatory conditions for merger approval.
51. TXU Electric Company, before the Public Utilities Commission of Texas, PUC Docket No. 22350/ SOAH Docket No. 473-00-1015 (2000), on behalf of Nucor Steel, re unbundled cost of service and rates.
52. PacifiCorp, before the Utah Public Service Commission, Docket No. 99-035-10 (2000), on behalf of Nucor Steel, re using system benefit charges to fund demand-side resource investments.

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53. Entergy Arkansas, Inc. *et al.*, before the Arkansas Public Service Commission, Docket No. 00-190-U (2000), on behalf of Nucor-Yamato Steel and Nucor Steel-Arkansas, re the development of competitive electric power markets in Arkansas.
54. Entergy Arkansas, Inc. *et al.*, before the Arkansas Public Service Commission, Docket No. 00-048-R (2000), on behalf of Nucor-Yamato Steel and Nucor Steel-Arkansas, re generic filing requirements and guidelines for market power analyses.
55. ScottishPower and PacifiCorp, before the Utah Public Service Commission, Docket No. 98-2035-04 (1999), on behalf of Nucor Steel, re merger conditions to protect the public interest.
56. Dominion Resources, Inc. and Consolidated Natural Gas Company, before the Virginia State Corporation Commission, Case No. PUA990020 (1999), on behalf of the City of Richmond, re market power and merger conditions to protect the public interest.
57. Houston Lighting & Power Company, before the Public Utility Commission of Texas, Docket No. 18465 (1998) on behalf of the Texas Commercial Customers, re excess earnings and stranded-cost recovery and mitigation.
58. PJM Interconnection, LLC, before the Federal Energy Regulatory Commission, Docket No. ER98-1384 (1998) on behalf of Wellsboro Electric Company, re pricing low-voltage distribution services.
59. DQE, Inc. and Allegheny Power System, Inc., before the Federal Energy Regulatory Commission, Docket Nos. ER97-4050-000, ER97-4051-000, and EC97-46-000 (1997) on behalf of the Borough of Chambersburg, re market power in relevant markets.
60. GPU Energy, before the New Jersey Board of Public Utilities, Docket No. EO97070458 (1997) on behalf of the New Jersey Commercial Users Group, re unbundled retail rates.
61. GPU Energy, before the New Jersey Board of Public Utilities, Docket No. EO97070459 (1997) on behalf of the New Jersey Commercial Users Group, re stranded costs.
62. Public Service Electric and Gas Company, before the New Jersey Board of Public Utilities, Docket No. EO97070461 (1997) on behalf of the New Jersey Commercial Users Group, re unbundled retail rates.
63. Public Service Electric and Gas Company, before the New Jersey Board of Public Utilities, Docket No. EO97070462 (1997) on behalf of the New Jersey Commercial Users Group, re stranded costs.

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64. DQE, Inc. and Allegheny Power System, Inc., before the Federal Energy Regulatory Commission, Docket Nos. ER97-4050-000, ER97-4051-000, and EC97-46-000 (1997) on behalf of the Borough of Chambersburg, Allegheny Electric Cooperative, Inc., and Selected Municipalities, re market power in relevant markets.
65. CSW Power Marketing, Inc., before the Federal Energy Regulatory Commission, Docket No. ER97-1238-000 (1997) on behalf of the Transmission Dependent Utility Systems, re market power in relevant markets.
66. Central Hudson Gas & Electric Corporation *et al.*, before the New York Public Service Commission, Case Nos. 96-E-0891, 96-E-0897, 96-E-0898, 96-E-0900, 96-E-0909 (1997), on behalf of the Retail Council of New York, re stranded-cost recovery.
67. Central Hudson Gas & Electric Corporation, supplemental testimony, before the New York Public Service Commission, Case No. 96-E-0909 (1997) on behalf of the Retail Council of New York, re stranded-cost recovery.
68. Consolidated Edison Company of New York, Inc., supplemental testimony, before the New York Public Service Commission, Case No. 96-E-0897 (1997) on behalf of the Retail Council of New York, re stranded-cost recovery.
69. New York State Electric & Gas Corporation, supplemental testimony, before the New York Public Service Commission, Case No. 96-E-0891 (1997) on behalf of the Retail Council of New York, re stranded-cost recovery.
70. Rochester Gas and Electric Corporation, supplemental testimony, before the New York Public Service Commission, Case No. 96-E-0898 (1997) on behalf of the Retail Council of New York, re stranded-cost recovery.
71. Texas Utilities Electric Company, before the Public Utility Commission of Texas, Docket No. 15015 (1996), on behalf of Nucor Steel-Texas, re real-time electricity pricing.
72. Central Power and Light Company, before the Public Utility Commission of Texas, Docket No. 14965 (1996), on behalf of the Texas Retailers Association, re cost of service and rate design.
73. Carolina Power & Light Company, before the South Carolina Public Service Commission, Docket No. 95-1076-E (1996), on behalf of Nucor Steel-Darlington, re integrated resource planning.
74. Texas Utilities Electric Company, before the Public Utility Commission of Texas, Docket No. 13575 (1995), on behalf of Nucor Steel-Texas, re integrated resource planning, DSM options, and real-time pricing.

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75. Arkansas Power & Light Company, *et al.*, Notice of Inquiry to Consider Section 111 of the Energy Policy Act of 1992, before the Arkansas Public Service Commission, Docket No. 94-342-U (1995), Initial Comments on behalf of Nucor-Yamato Steel Company, re integrated resource planning standards.
76. Arkansas Power & Light Company, *et al.*, Notice of Inquiry to Consider Section 111 of the Energy Policy Act of 1992, before the Arkansas Public Service Commission, Docket No. 94-342-U (1995), Reply Comments on behalf of Nucor-Yamato Steel Company, re integrated resource planning standards.
77. Arkansas Power & Light Company, *et al.*, Notice of Inquiry to Consider Section 111 of the Energy Policy Act of 1992, before the Arkansas Public Service Commission, Docket No. 94-342-U (1995), Final Comments on behalf of Nucor-Yamato Steel Company, re integrated resource planning standards.
78. South Carolina Pipeline Corporation, before the South Carolina Public Service Commission, Docket No. 94-202-G (1995), on behalf of Nucor Steel, re integrated resource planning and rate caps.
79. Gulf States Utilities Company, before the United States Court of Federal Claims, *Gulf States Utilities Company v. the United States*, Docket No. 91-1118C (1994, 1995), on behalf of the United States, re electricity rate and contract dispute litigation.
80. American Electric Power Corporation, before the Federal Energy Regulatory Commission, Docket No. ER93-540-000 (1994), on behalf of DC Tie, Inc., re costing and pricing electricity transmission services.
81. Texas Utilities Electric Company, before the Public Utility Commission of Texas, Docket No. 13100 (1994), on behalf of Nucor Steel-Texas, re real-time electricity pricing.
82. Carolina Power & Light Company, *et al.*, Proposed Regulation Governing the Recovery of Fuel Costs by Electric Utilities, before the South Carolina Public Service Commission, Docket No. 93-238-E (1994), on behalf of Nucor Steel-Darlington, re fuel-cost recovery.
83. Southern Natural Gas Company, before the Federal Energy Regulatory Commission, Docket No. RP93-15-000 (1993-1995), on behalf of Nucor Steel-Darlington, re costing and pricing natural gas transportation services.
84. West Penn Power Company, *et al.*, v. State Tax Department of West Virginia, *et al.*, Civil Action No. 89-C-3056 (1993), before the Circuit Court of Kanawha County, West Virginia, on behalf of the West Virginia Department of Tax and Revenue, re electricity generation tax.

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85. Carolina Power & Light Company, *et al.*, Proceeding Regarding Consideration of Certain Standards Pertaining to Wholesale Power Purchases Pursuant to Section 712 of the 1992 Energy Policy Act, before the South Carolina Public Service Commission, Docket No. 92-231-E (1993), on behalf of Nucor Steel-Darlington, re Section 712 regulations.
86. Mountain Fuel Supply Company, before the Public Service Commission of Utah, Docket No. 93-057-01 (1993), on behalf of Nucor Steel-Utah, re costing and pricing retail natural gas firm, interruptible, and transportation services.
87. Texas Utilities Electric Company, before the Public Utility Commission of Texas, Docket No. 11735 (1993), on behalf of the Texas Retailers Association, re retail cost-of-service and rate design.
88. Virginia Electric and Power Company, before the Virginia State Corporation Commission, Case No. PUE920041 (1993), on behalf of Philip Morris USA, re cost of service and retail rate design.
89. Carolina Power & Light Company, before the South Carolina Public Service Commission, Docket No. 92-209-E (1992), on behalf of Nucor Steel-Darlington.
90. Gulf States Utilities Company, before the Louisiana Public Service Commission, Docket No. U-17282, Rate Design (1992), on behalf of the Department of Energy, Strategic Petroleum Reserve.
91. Georgia Power Company, before the Georgia Public Service Commission, Docket Nos. 4091-U and 4146-U (1992), on behalf of Amicalola Electric Membership Corporation.
92. PacifiCorp, Inc., before the Federal Energy Regulatory Commission, Docket No. EC88-2-007 (1992), on behalf of Nucor Steel-Utah.
93. South Carolina Pipeline Corporation, before the South Carolina Public Service Commission, Docket No. 90-452-G (1991), on behalf of Nucor Steel-Darlington.
94. Carolina Power & Light Company, before the South Carolina Public Service Commission, Docket No. 91-4-E, 1991 Fall Hearing, on behalf of Nucor Steel-Darlington.
95. Sonat, Inc., and North Carolina Natural Gas Corporation, before the North Carolina Utilities Commission, Docket No. G-21, Sub 291 (1991), on behalf of Nucor Corporation, Inc.
96. Northern States Power Company, before the Minnesota Public Utilities Commission, Docket No. E002/GR-91-001 (1991), on behalf of North Star Steel-Minnesota.

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97. Gulf States Utilities Company, before the Louisiana Public Service Commission, Docket No. U-17282, Phase IV-Rate Design (1991), on behalf of the Department of Energy, Strategic Petroleum Reserve.
98. Houston Lighting & Power Company, before the Public Utility Commission of Texas, Docket No. 9850 (1990), on behalf of the Department of Energy, Strategic Petroleum Reserve.
99. General Services Administration, before the United States General Accounting Office, Contract Award Protest (1990), Solicitation No. GS-00P-AC87-91, Contract No. GS-00D-89-B5D-0032, on behalf of Satilla Rural Electric Membership Corporation, re cost of service and rate design.
100. Carolina Power & Light Company, before the South Carolina Public Service Commission, Docket No. 90-4-E (1990 Fall Hearing), on behalf of Nucor Steel-Darlington, re fuel-cost recovery.
101. Gulf States Utilities Company, before the Louisiana Public Service Commission, Docket No. U-17282, Phase III-Rate Design (1990), on behalf of the Department of Energy, Strategic Petroleum Reserve, re cost of service and rate design.
102. Atlanta Gas Light Company, before the Georgia Public Service Commission, Docket No. 3923-U (1990), on behalf of Herbert G. Burris and Oglethorpe Power Corporation, re anticompetitive pricing schemes.
103. Ohio Edison Company, before the Ohio Public Utilities Commission, Case No. 89-1001-EL-AIR (1990), on behalf of North Star Steel-Ohio, re cost of service and rate design.
104. Gulf States Utilities Company, before the Louisiana Public Service Commission, Docket No. U-17282, Phase III-Cost of Service/Revenue Spread (1989), on behalf of the Department of Energy, Strategic Petroleum Reserve.
105. Northern States Power Company, before the Minnesota Public Utilities Commission, Docket No. E002/GR-89-865 (1989), on behalf of North Star Steel-Minnesota.
106. Gulf States Utilities Company, before the Louisiana Public Service Commission, Docket No. U-17282, Phase III-Rate Design (1989), on behalf of the Department of Energy, Strategic Petroleum Reserve.
107. Utah Power & Light Company, before the Utah Public Service Commission, Case No. 89-039-10 (1989), on behalf of Nucor Steel-Utah and Vulcraft, a division of Nucor Steel.
108. Soyland Power Cooperative, Inc. v. Central Illinois Public Service Company, Docket No. EL89-30-000 (1989), before the Federal Energy Regulatory Commission, on behalf of Soyland Power Cooperative, Inc., re wholesale contract pricing provisions

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109. Gulf States Utilities Company, before the Public Utility Commission of Texas, Docket No. 8702 (1989), on behalf of the Department of Energy, Strategic Petroleum Reserve.
110. Houston Lighting and Power Company, before the Public Utility Commission of Texas, Docket No. 8425 (1989), on behalf of the Department of Energy, Strategic Petroleum Reserve.
111. Northern Illinois Gas Company, before the Illinois Commerce Commission, Docket No. 88-0277 (1989), on behalf of the Coalition for Fair and Equitable Transportation, re retail gas transportation rates.
112. Carolina Power & Light Company, before the South Carolina Public Service Commission, Docket No. 79-7-E, 1988 Fall Hearing, on behalf of Nucor Steel-Darlington, re fuel-cost recovery.
113. Potomac Electric Power Company, before the District of Columbia Public Service Commission, Formal Case No. 869 (1988), on behalf of Peoples Drug Stores, Inc., re cost of service and rate design.
114. Carolina Power & Light Company, before the South Carolina Public Service Commission, Docket No. 88-11-E (1988), on behalf of Nucor Steel-Darlington.
115. Northern States Power Company, before the Minnesota Public Utilities Commission, Docket No. E-002/GR-87-670 (1988), on behalf of the Metalcasters of Minnesota.
116. Ohio Edison Company, before the Ohio Public Utilities Commission, Case No. 87-689-EL-AIR (1987), on behalf of North Star Steel-Ohio.
117. Carolina Power & Light Company, before the South Carolina Public Service Commission, Docket No. 87-7-E (1987), on behalf of Nucor Steel-Darlington.
118. Gulf States Utilities Company, before the Louisiana Public Service Commission, Docket No. U-17282, Phase I (1987), on behalf of the Strategic Petroleum Reserve.
119. Gulf States Utilities Company, before the Public Utility Commission of Texas, Docket No. 7195 (1987), on behalf of the Strategic Petroleum Reserve.
120. Gulf States Utilities Company, before the Federal Energy Regulatory Commission, Docket No. ER86-558-006 (1987), on behalf of Sam Rayburn G&T Cooperative.
121. Utah Power & Light Company, before the Utah Public Service Commission, Case No. 85-035-06 (1986), on behalf of the U.S. Air Force.

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122. Houston Lighting & Power Company, before the Public Utility Commission of Texas, Docket No. 6765 (1986), on behalf of the Strategic Petroleum Reserve.
123. Central Maine Power Company, before the Maine Public Utilities Commission, Docket No. 85-212 (1986), on behalf of the U.S. Air Force.
124. Gulf States Utilities Company, before the Public Utility Commission of Texas, Docket Nos. 6477 and 6525 (1985), on behalf of North Star Steel-Texas.
125. Ohio Edison Company, before the Ohio Public Utilities Commission, Docket No. 84-1359-EL-AIR (1985), on behalf of North Star Steel-Ohio.
126. Utah Power & Light Company, before the Utah Public Service Commission, Case No. 84-035-01 (1985), on behalf of the U.S. Air Force.
127. Central Vermont Public Service Corporation, before the Vermont Public Service Board, Docket No. 4782 (1984), on behalf of Central Vermont Public Service Corporation.
128. Gulf States Utilities Company, before the Louisiana Public Service Commission, Docket No. U-15641 (1983), on behalf of the Strategic Petroleum Reserve.
129. Southwestern Power Administration, before the Federal Energy Regulatory Commission, Rate Order SWPA-9 (1982), on behalf of the Department of Defense.
130. Public Service Company of Oklahoma, before the Federal Energy Regulatory Commission, Docket Nos. ER82-80-000 and ER82-389-000 (1982), on behalf of the Department of Defense.
131. Central Maine Power Company, before the Maine Public Utilities Commission, Docket No. 80-66 (1981), on behalf of the Commission Staff.
132. Bangor Hydro-Electric Company, before the Maine Public Utilities Commission, Docket No. 80-108 (1981), on behalf of the Commission Staff.
133. Oklahoma Gas & Electric, before the Oklahoma Corporation Commission, Docket No. 27275 (1981), on behalf of the Commission Staff.
134. Green Mountain Power, before the Vermont Public Service Board, Docket No. 4418 (1980), on behalf of the PSB Staff.
135. Williams Pipe Line, before the Federal Energy Regulatory Commission, Docket No. OR79-1 (1979), on behalf of Mapco, Inc.
136. Boston Edison Company, before the Massachusetts Department of Public Utilities, Docket No. 19494 (1978), on behalf of Boston Edison Company.

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137. Duke Power Company, before the North Carolina Utilities Commission, Docket No. E-7, Sub 173, on behalf of the Commission Staff.
138. Duke Power Company, before the North Carolina Utilities Commission, Docket No. E-100, Sub 32, on behalf of the Commission Staff.
139. Virginia Electric & Power Company, before the North Carolina Utilities Commission, Docket No. E-22, Sub 203, on behalf of the Commission Staff.
140. Virginia Electric & Power Company, before the North Carolina Utilities Commission, Docket No. E-22, Sub 170, on behalf of the Commission Staff.
141. Southern Bell Telephone Company, before the North Carolina Utilities Commission, Docket No. P-5, Sub 48, on behalf of the Commission Staff.
142. Western Carolina Telephone Company, before the North Carolina Utilities Commission, Docket No. P-58, Sub 93, on behalf of the Commission Staff.
143. Natural Gas Ratemaking, before the North Carolina Utilities Commission, Docket No. G-100, Sub 29, on behalf of the Commission Staff.
144. General Telephone Company of the Southeast, before the North Carolina Utilities Commission, Docket No. P-19, Sub 163, on behalf of the Commission Staff.
145. Carolina Power and Light Company, before the North Carolina Utilities Commission, Docket No. E-2, Sub 264, on behalf of the Commission Staff.
146. Carolina Power and Light Company, before the North Carolina Utilities Commission, Docket No. E-2, Sub 297, on behalf of the Commission Staff.
147. Duke Power Company, *et al.*, Investigation of Peak-Load Pricing, before the North Carolina Utilities Commission, Docket No. E-100, Sub 21, on behalf of the Commission Staff.
148. Investigation of Intrastate Long Distance Rates, before the North Carolina Utilities Commission, Docket No. P-100, Sub 45, on behalf of the Commission Staff.